JERI L. S. MOREY ARCHITECT

(361) 866-8923 711 N. Carancahua, #518 Corpus Christi, TX 78475



jmorey@interconnect.net July 20, 2005

WTC Technical Information Repository Attn. Mr. Stephen Cauffman National Institute of Standards and Technology Stop 8610 Gaithersburg, MD 20899-8610

Re: Report# NCSTAR 1-Draft WTC Investigation

REFERENCE: P.# 218: Recommendations 29[B] and 30. "... NIST recommends that continuing education curricula should be developed and programs should be implemented for training . . . architects and fire protection engineers in modern fire protection principles and technologies, including fire-resistant design of structures." [and] "academic, professional short-course, and web-based training materials . . . To strengthen the base of of available technical capabilities and human resources. . . . Affected Organizations

SUGGESTED REVISION: "....NIST recommends that a program of dialogue and advocacy between the fire protection engineering community and the architectural community begin, which will culminate in both academic and continuing education curricula and training for architects" [for both recommendations] "Affected Organizations ... AIA, at the national, regional, and chapter levels, NCARB (National Council of Architectural Registration Boards), and NAAB (National Architectural Accrediting Board), and ICC (the International Code Council)...."

REASONS: I have spent much of the last ten years trying to do advocacy for fire safe design at the local level and have uncovered some of the difficulties. I have read much of the fire protection engineering material, talked with other architects, helped prepare and support the presentation of a rudimentary fire protection engineering program (along with a building code education program) to our local architects. Along the way, I found it necessary to photograph and share "horror stories" of buildings that may kill; file complaints with the City and our licensing board because the affected architects didn't believe me; researched building code enforcement and A-E liability law; and written many letters to our state licensing professionals, architects, and some affected client representatives. When we planned our C.E. program, I heard lots of excuses from my fellow professionals as to why they did not want to come to this kind of program, and have answered these with reasons why they need to. I have done my homework very thoroughly re code interpretations & fire protection engineering principles (including several SFPE C.E. programs.) I have enlisted the support of both building officials, a few architect leaders who want to be responsible, and attorneys both in private practice, with ICC, and with the City - to make some progress. As our leadership committee planned our program, many architects complained about how long the program was and what days they had to attend; we believed the scope was minimal, compared to the need. Last month, 60 people attended the two + day C.E. program co-sponsored by the City of Corpus Christi and AIA Corpus Christi, and all reports we received from participants indicated that it was a great success. As we planned it, national leaders told us both architects and code officials need to learn the same things at the same time, and in this respect also it was a qualified success. But in terms of needed subject matter, we barely taught some basics. And that success was for a Corpus Christi program where most of the participants did not travel overnight and for which the price was less than half that of all known commercial programs; if it had been given in Houston or even Austin, I might have been one of only two or three from here to attend. Only 8 to 10 chapter members usually attend our state convention or a continuing ed. program on South Padre Island. Another tool we used to get our local leaders to sell the program was to set it up so that our AIA Chapter could financially benefit. The leadership committee received the early registration list, and those firms did not plan to attend were asked to reconsider by committee architects who knew them best.

Based on my experience, I believe we must start with analyzing the fire safety mistakes that get built, share these horrors of potential as well as historical losses with our leaders, in order to get our profession ready to learn. We need to give them some inkling of how widespread these dangers are, and also to identify exactly what the needs are. While systematic national research based on random sampling would be very desirable, at least we should begin with some spot audits which include recording photos and/or drawings of architect-designed buildings being wrongly built, in several US cities. When we have done this and shared them with an analysis with our leaders, I believe my fellow professionals will be more ready to learn. When we have convinced the leaders, they and not someone like me can sell it. At some point, it needs to be a part of our mandatory continuing ed. for licensure. When we have analyzed what the failings of architects are, we will also be better able to tailor the program content to exactly what principles we are missing and to when we need the services of a FPE. Very likely, many architects will need an FPE not only for Alternate Means and Methods, but also for recognizing how much renovation is needed when we do substantial renovations of exiting buildings.

In terms of professional goals, I believe architects in many locations are now getting most of our professional goals of openness and beauty met; but we are not getting the safety we need, because neither code officials nor architects know enough. A second part of the problem is that we architects want beauty and not safety because that is what our profession primarily rewards, and the sanctions for safety are very ineffective. So we don't want to spend more construction dollars on fire protection and we don't want to spend more of our fees. So to simply try to sell us on wonderful benefits of FPE, or to invite us to attend one national program, I believe will be of extremely limited success. Some changes should be made to our Design Awards and our Design education grading criteria. Altogether, it is a program of Systemic Social Change. But if architects don't change our values, our knowledge, and our behavior, we will sooner or later experience a great disaster and we will find more and more of our area of practice taken over by Architectural Engineers. None of us want that!

So, if you are going to recommend this, which organization(s) will take a management/leadership role and who will be the advocate in charge? Without an action plan, not much will happen!

Yours truly,
Jenis A. Moy

Jeri L. S. Morey, AIA

afl. m. SFPE prof. m. ICC From: "Jeri L. S. Morey" <jmorey@interconnect.net>

To: wtc@nist.gov Cc: dlowe@nist.gov

Subject: WTC Draft Final Report Comment Form for Report: NCSTAR 1

Information Submitted on: 7/8/2005.

Name : Jeri L. S. Morey

Affiliation: Jeri L. S. Morey, Architect Email Address: jmorey@interconnect.net

Phone: 361-866-8923

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Paragraph: Recommendation 26: ".... Further, occupancy requirements should be modified where needed (such as when there are assembly use spaces within an

office building) to meet the requirements of the model codes."

Comment: I think this is a little bid confusing. Your comments following this are good, but maybe not sufficient to say what needs to be said. What is needed is that all buildings should be evaluated and designed for all building uses, and when additional non-accessory uses are added to a building, all them need to be evaluated, either as separated or non-separated uses, and all egress routes and fire protections upgraded when they no longer meet the codes under which they were built, altered, and expanded.

Comment Reason: See above.

Revision Suggestion: Whenever new uses are added to a building, whether as tenant finish-out, or as an alteration of addition, or simply in the way the building is used for a portion of the time, the building must be re-designed for the egress and fire protection requirements for the complete set of non-accessory uses, per then current model code.

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